

EXHIBIT 2

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January 28, 2011

BY ELECTRONIC MAIL

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Re: Search Terms

Dear Terry:

Thank you for your letter of January 24, 2011, responding to our draft list of search terms we will use to locate electronic documents responsive to your 119 document requests. By sharing our search terms with you at the outset of our electronic discovery efforts, we are attempting to be as cooperative as possible and to reduce delays down the road by avoiding disputes. However, we cannot agree to make all the changes you request in your letter as several of them are not likely to find responsive documents, are much too broad and will only serve to increase the already high costs of electronic discovery in this case. We hope we will be able to work out these issues with you and look forward to doing so.

I have responded below using the same numbered paragraphs as you did in your letter.

1. We will search the hard drives, current electronic mail and file share data for those custodians we believe may have responsive documents. That is in addition to searching locations where hard copy documents are stored.
2. We will use root expanders for all of the relevant search terms. We will also search for any plural versions of these terms.
3. For names with accents in them, we are working with our vendor to make sure our search will retrieve those documents that use the word with the accent.
4. We do not intend to search the words "Araujo" or "Jimenez" as that search is much too broad. Instead, we will review documents that have been filtered by our search terms. For example, if Mr. Jimenez sent an email about the railroad bombings, the search terms related to those bombings will capture any relevant documents, and they will be reviewed.
5. All search terms will be translated into Spanish, including "paramilitaries." We will search for "Autodefensas" standing alone, as well as "Juan Andres Alvarez."
6. All search terms will be translated into Spanish.

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7. We will consider adding specific search terms but cannot commit to search for "common synonyms" since we may no doubt disagree about what is a "common synonym." We will search for "attack," "massacre," "terrorize" and "terrorism." The words "target" and "execute" are used in many contexts unrelated to this case that we do not believe they will be useful search terms standing alone.

8. We will of course produce any documents related to the paramilitaries named in your requests, including any documents related to the Justice and Peace Process or other legal proceedings involving those paramilitaries. There is no need to broaden the search terms beyond those names and beyond the other search terms on our list.

9. As for the paternal last names, we can search for those names for specific paramilitaries but we cannot do so for the entire list of decedents as that list is much too long and searching all of those names will pull up documents related to other individuals with the same (very common) paternal names. We will therefore search for "Mattos," "Tovar," "Charris," "Ospino," "Esquivel," "Mancuso" and "Pianeta." We will not search for "Garcia" it is an extremely common name.

10. We will search for "Departamentao Administrativo de Seguridad," as well as FBI/CIA and their full names.

11. We will not search for all of Mr. Araujo's relatives mentioned in the SAC. Your interest appears to be whether those relatives have any link to the paramilitaries and our current search list will capture any relevant documents as to that point. There is no need to expand our search.

12. We will include the search terms "protection payments," "war tax," "extort," "blood money" and "dirty money."

13. We will include the search terms "armbands," "armed group" and "armed men." However, we believe the terms "margen de la ley" (illegal), "uniform," and "irregular" are simply too broad to be useful.

14. We will not search for the names of those companies. As an initial matter, none of those companies are alleged to have anything to do with the killings at issue here and the SAC does not even mention BP, Del Monte or Occidental. Our cooperative efforts in sharing our search terms should not be used as a reason to expand your already-extensive document requests to engage in a fishing expedition for any other litigation you may have.

15. We will not conduct a search for names of towns. Such a search would not be likely to discover any relevant documents not already captured by our search terms.

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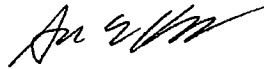
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16. For the same reasons as described in paragraph 4, we do not believe the names "Garry Drummond" and "Mike Tracy" will be useful as stand-alone search terms.

Please let me know if you would like to discuss this further.

Sincerely,



Sara E. Kropf

cc: Laina Lopez, Esq. (via electronic mail)